

# NRC INSPECTION MANUAL

ORPB:DI

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## PART 9900: TECHNICAL GUIDANCE

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ANSI515.TG

### AMERICAN NATIONAL STANDARDS INSTITUTE ANSI N18.7-1972, SECTION 5.1.5

#### A. PURPOSE

To provide guidance on ANSI Standard N18.7-1972, Section 5.1.5 as it relates to independent verification of tagging equipment as provided in an NRR memorandum dated June 6, 1985.

#### B. BACKGROUND

Region III requested assistance in interpreting the requirements of NUREG-0730, Section I.C.6, relative to independent verification of tagging equipment out of service. The request was made as a result of the performance of a licensee who had committed to the requirements of the 1972 version of the ANSI standard in this area. The response to this request was provided by NRR.

#### C. DISCUSSION

The ANSI standard defines the word "should" as meaning a recommendation. The NRC staff applies a similar connotation to the word. The words "where appropriate" are undefined in the ANSI standard, and thus are vague as to their precise meaning.

The licensee correctly notes that the 1972 version of the ANSI standard to which the licensee is committed requires "independent verification, where appropriate, to ensure that necessary measures, such as tagging equipment, have been implemented correctly." These same words are continued in the 1976 version of the standard (Section 5.2.6). Thus, in NRR's view the licensee was not committed to provide independent verification of tag-out of equipment important to safety unless the licensee chose to interpret the words "where appropriate" as including such equipment.

We know from actual experience, however, that unsafe conditions can develop when the wrong equipment is tagged out of service as well as when equipment is being put back into service. Therefore, NRR believes that independent verification is needed to ensure that the proper equipment has been tagged out. That position is reinforced by the 1982 version of ANSI/ANS 3.2. Section 5.2.6 of this version

presents a significantly stronger, more positive statement concerning this matter than did the 1972 version to which the licensee had committed. The appropriate portion is quoted below:

"When a system important to safety is removed from service, independent verification shall be provided to the extent necessary to assure that the proper system was removed. This may be accomplished by checking appropriate equipment and controls, or by indirect means such as observation of indicators and status lights. This requirement may be waived if the only way of accomplishing it would result in significant radiation exposure."

#### D. CONCLUSION

In summary, the commitment to ANSI N18.7-1972 does commit a licensee to independent verification of equipment tag out. The wording of the standard certainly suggests that such independent verification be performed, but it does not require it. The wording of NUREG-0737 also strongly suggests that independent verification of equipment tag out be performed, but does not require it.

#### E. REFERENCE

The guidance provided in this directive was extracted from a memorandum from Hugh L. Thompson, Jr., Director, Division of Licensing, NRR, to R.L. Spessard, Director, Division of Reactor Safety, Region III, dated June 6, 1985, subject: Zion 1 and 2 -- Independent Verification Of Tagging Equipment Out Of Service. The complete memorandum is available in the Document Control System (DCS #30985-277).

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